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Employers Holdings Inc. and  
EIG Services*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

TAMARA SPEAKS,  
Plaintiff,

vs.

EMPLOYERS HOLDINGS INC., a Nevada  
corporation; EIG SERVICES, INC., a Florida  
corporation; DOES I THROUGH X,  
INCLUSIVE, AND ROES I THROUGH X,  
INCLSUIVE,

Defendants.

Case No. 2:23-cv-00068-GMN-BNW

**STIPULATION TO EXTEND TIME  
FOR DEFENDANTS TO FILE A  
REPLY IN SUPPORT OF:**

**(1) DEFENDANTS' MOTIONS TO  
DISMISS**

**(2) DEFENDANTS' RENEWED  
MOTION TO STAY DISCOVERY**

**(FIRST REQUEST)**

IT IS HEREBY STIPULATED by and between Tamara Speaks ("Plaintiff"), by and through her counsel Paul Padda Law, PLLC and Defendants Employers Holdings, Inc. ("EHI") and Defendant EIG Services, Inc. ("EIG") (collectively "Defendants"), through their counsel Jackson Lewis P.C., that Defendants shall have an extension, up to and including June 30, 2023, in which to file a reply to Plaintiff's Opposition to EIG's Motion to Dismiss (ECF No. 49), Plaintiff's Opposition to EHI's Motion to Dismiss (ECF No. 50), and Plaintiff's Opposition to Defendants' Motion to Stay Discovery (ECF No. 51). This Stipulation is submitted and based upon the following:

1. On May 12, 2023, Defendant EIG filed a Motion to Dismiss Plaintiff's Second Amended Complaint. ECF No. 40. In addition, Defendant EHI filed its own Motion to Dismiss

1 Plaintiff's Second Amended Complaint and a Joinder to Defendant EIG Services' Motion to  
2 Dismiss Plaintiff's Second Amended Complaint. ECF Nos. 41 and 42.

3 2. On May 26, 2023, the parties stipulated and agreed to extend Plaintiff's time to file  
4 an opposition to these motions. ECF No. 46.

5 3. On June 12, 2023, Plaintiff filed her (1) Opposition to EIG's Motion to Dismiss,  
6 Opposition to EHI's Motion to Dismiss, and Opposition to Defendants' Motion to stay discovery.  
7 ECF Nos. 49, 50, and 51.

8 4. Defendants' replies in support of these motions are due on June 20, 2023.<sup>1</sup>

9 5. Despite diligently working, Defendants have been unable to complete their replies  
10 as counsel has been required to respond to other time sensitive matters.

11 6. During the relevant time, counsel has been required to complete a motion for  
12 summary judgment, travel to Reno for an in-person hearing, respond to other discovery requests,  
13 and respond to several administrative charges.

14 7. The parties hereby stipulate and agree that good cause supports extending the time  
15 for Defendants to reply to the above oppositions from June 20, 2023, to June 30, 2023.

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28 <sup>1</sup> The deadline for these replies originally fell on June 19, 2023. As June 19<sup>th</sup> is now a recognized federal holiday, the  
deadline was advanced to June 20, 2023.

8. This stipulation is made in good faith and not for the purpose of delay.

Dated this 20th day of June, 2023.

JACKSON LEWIS P.C.

PAUL PADDA LAW, PLLC

/s/ Katlyn M. Brady

/s/ Paul S. Padda

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*Attorneys for Defendants*

*Attorney for Plaintiff*

**ORDER**

IT IS ORDERED that ECF No. 55 is GRANTED.

IT IS FURTHER ORDERED that Defendants have until June 30, 2023 to submit their reply in support of their Motion to Stay Discovery (at ECF No. 44).

IT IS SO ORDERED

DATED: 10:24 am, June 21, 2023



BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE